

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA SAN JOSE DIVISION**

KOJI IP, LLC,

Plaintiff,

V.

RENESAS ELECTRONICS AMERICA, INC.

Defendant

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Civil Action No. 5:24-cv-03089

DECLARATION OF CARLOS GORRICHATEGUI

I, Carlos Gorrichategui, declare:

1. My name is Carlos Gorrichategui, and I am over the age of eighteen and competent to make this declaration. The facts stated herein are within my personal knowledge. If called upon, I could and would testify competently to them. I am currently president of Dynamic IP Deals LLC and manager of KOJI IP, LLC (a Texas limited liability company or “Texas LLC”).
2. On June 30, 2023, William Ramey and I to file the first complaint Civil Action No. 1:23-cv-01674 against RENESAS ELECTRONICS AMERICA, INC (“Renesas”).
3. On July 19, 2023, Jeff Kubiak communicated with us that Renesas raised certain issues with regard to the claim chart accompanying the complaint.
4. On Jul 31, 2023, at my direction, Simon Sunatori sent Jeff, William and me a technical rebuttal to the issues raised by Renesas.
5. William Ramey informed me that we would likely lose the venue motion and I authorized him to dismiss the Colorado, if we could refile elsewhere. I was informed the case would be refiled in California.

6. On November 8, 2023, William Ramey told us that a second case Koji IP v. Renesas Electronics America, Inc., Case No. 5:24-cv-03089 (N.D. Cal.) had been filed.
7. On Dec 22, 2023, William Ramey forwarded us a letter from Renesas where they alleged a very low sales volume of less than \$5,000 and certain technical issues with our infringement accusation. Based on the low sales volume I authorized the dismissal of the lawsuit due to the low sales volume.
8. On January 2, 2024, I and my team responded to Renesas technical issues.
9. Shortly thereafter, my team and I identified other infringing devices sold by Renesas and began developing claim charts.
10. On Feb 23, 2024, William Ramey told us that the second case was dismissed without prejudice due to low sales of the charted product.
11. On April 25, 2024, I told William Ramey that my team and I revisited the Renesas Electronics claim chart and wanted to seek damages on a new product we charted. I authorized the filing of the Third suit if we could. William Ramey informed me that we could file the Third lawsuit.
12. On May 31, 2024, William Ramey forwarded us “2024.05.31 Letter to Koji IP re third case.pdf” I discussed the matter with William Ramey and authorized him to dismiss the suit to avoid a fight on a motion for sanctions.
13. On June 12, 2024, William Ramey told me the case was dismissed.
14. Simon Sunatori is an independent contractor who works for Dynamic IP Deals LLC on a project basis. Mr. Sunatori is not an owner of Dynamic IP Deals LLC. Mr. Sunatori is not an employee or owner of KOJI IP, LLC.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 12th day of September, 2024 in Houston, Texas.



Carlos Gorrichategui, Ph.D